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Global Experience Specialists, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEPHANIE HUTCHINSON, an individual;)	Case No. 2:16-cv-2397-GMN-GWF
)	
Plaintiff,)	STIPULATION AND ORDER
)	TO EXTEND SCHEDULING
v.)	ORDER DEADLINES
)	(Fourth Request)
GLOBAL EXPERIENCE SPECIALISTS,)	
INC.; EMPLOYEE(S)/AGENT(S) DOES 1-)	
10; and ROE CORPORATIONS 11-20,)	
inclusive;)	
)	
Defendants.)	
)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	February 16, 2018
Dispositive Motion Deadline	March 19, 2018
Joint Pretrial Order	April 18, 2018 or 30 days from the ruling on a dispositive motion

This is the fourth request for an extension of these deadlines. The parties provide the following information to the Court regarding the proposed extension of the discovery deadline.

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Discovery Completed To Date

The parties have served their Initial Disclosures and supplements thereto. Various documents have been subpoenaed. Defendants have served interrogatories and requests for production, and Plaintiff has responded. Plaintiff has served interrogatories, requests for admissions and requests for production and Defendant has responded. Plaintiff and four current employees of Defendant have been deposed.

Remaining Discovery To Be Completed

The depositions of Pat James and Sheila Glenn, and potentially other depositions and written discovery.

Reasons Discovery Could Not Be Completed Within The Existing Deadline

Perhaps the most important defense witness in this case, Patricia James, retired from GES and is believed to reside in St. Lucia. Ms. James has recently returned to Las Vegas for a period of time, and will now be available for a deposition in the coming weeks at a mutually-convenient time. Sheila Glenn was scheduled for a deposition on November 15, 2017, but the deposition had to be postponed because Ms. Glenn was called for jury duty that week.

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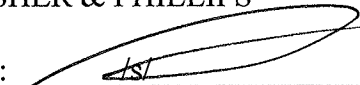
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Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of February 16, 2018.

FISHER & PHILLIPS

By: 

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GABROY LAW OFFICES

By: _____/s/_____
Christian Gabroy, Esq.
The District at Green Valley Ranch
170 South Green Valley Parkway
Suite 280
Henderson, NV 89012
Attorney for Plaintiff

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 11/20/2017

FISHER & PHILLIPS LLP
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